

EXHIBIT 1

Daniel Webster

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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MARYLAND SHALL ISSUE, INC., :
et al., :
: Case No:
Plaintiffs : 16-cv-3311-MJG
:
-vs- : Pages 1 - 337
:
LAWRENCE HOGAN, in his :
capacity of Governor of :
Maryland, et al., :
:
Defendants :
-----X

Deposition of Daniel Webster, Ph.D.
Washington, D.C.
Wednesday, June 13, 2018

Reported by: Kathleen M. Vaglica, RPR, RMR
Job No: 409352

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1 They did something that Nebraska does,
2 which is, if you are purchasing a regulated firearm
3 from a licensed firearm dealer, that you do not have
4 to produce a current valid permit or license for
5 those, for those exchanges. So now there are nine
6 states that have those.

7 Q. And what are those remaining nine states?

8 A. Those remaining -- and the District of
9 Columbia as well has something that basically is the
10 same thing as a license, but, so the current states
11 that have these laws include Connecticut,
12 Massachusetts, New York, New Jersey, Hawaii,
13 Maryland, of course, Illinois, North Carolina, Iowa.

14 Q. That's a total of nine.

15 A. Okay. I got the nine. Okay. Thank you.

16 Q. I didn't want you to struggle if you got
17 them all. I didn't want to cut anything off if you
18 had more in mind.

19 A. No, that's the right number.

20 Q. Now, do you know Connecticut's
21 requirements compared to Maryland? Are they the
22 same?

1 A. No, they are not the same. So no, none of
2 those states are exactly like Maryland. So one
3 similarity between Connecticut and Maryland is that
4 they both require, they both require safety training
5 before you can get it. They both require
6 fingerprinting. They both require, in addition to
7 having a valid permit or license, that at a point of
8 sale there is still an initial background check
9 done.

10 Those are the things that I can recall
11 right now that are similar between Connecticut
12 and -- the issuance is different in that Connecticut
13 you go directly to the law enforcement agency as
14 opposed to Maryland.

15 Q. All right. And do you know what the
16 requirements for the training in Connecticut are
17 compared to Maryland?

18 A. They are longer I know. I know the course
19 requirement is, like, an eight-hour course as
20 opposed to a four-hour course.

21 Q. They require the basic NRA pistol course
22 or equivalent; correct?

1 reapplication or a renewal of their license. So
2 very rarely that the State Police do anything.

3 I mean, yes, you had to have a license, a
4 state license, but their ability to actually make
5 sure that dealers were in compliance was minimal.
6 So I think that was a significant enhancement that
7 was necessary and important.

8 And then I think the firearms theft and
9 loss reporting requirement is important as well
10 based upon some studies we've done and others
11 showing that these are correlated with, not having
12 these measures are correlated with more firearm
13 trafficking indicators.

14 So those provisions, I think, are
15 important, in addition to what was mentioned in my
16 testimony.

17 Q. And you said that the Handgun
18 Qualification License you felt was the most
19 important of these?

20 A. Yes.

21 Q. Why was that?

22 A. Basically, based upon the best data that

1 we had, the states with permit-to-purchase licensing
2 had proportionally fewer of their guns used in
3 crime, actually came from guns that they sold and
4 were regulated under state law. They had fewer
5 number of guns that made their way very quickly from
6 a retail sale to criminal involvement.

7 They generally had lower levels of firearm
8 mortality and a growing body of evidence in what we
9 had begun of our first iteration of the effect of
10 Missouri's repeal of a handgun purchaser licensing
11 system. At that time, again, the evidence was
12 indicating that the purchaser licensing was
13 protective both against diversions of guns from
14 criminal use and against homicide rights, preventive
15 against homicide.

16 We now have additional research that makes
17 me feel even stronger that this is a type of policy
18 that is among our most effective at curtailing gun
19 violence.

20 Q. So what did Missouri's permit-to-purchase
21 plan have in common with Maryland's HQL requirement?

22 A. Well, first and foremost, if you were

1 going to purchase a handgun, you needed to get a
2 permit. And that was always step one. I think
3 that's the most important.

4 Q. And that was a permit that you had to
5 apply directly to a law enforcement agency in
6 Missouri to get; correct?

7 A. Yes.

8 Q. Unlike Maryland?

9 MR. SCOTT: Objection.

10 THE WITNESS: Correct.

11 BY MR. SWEENEY:

12 Q. And Missouri didn't require fingerprinting
13 like Maryland requires fingerprinting, did it?

14 A. That's right.

15 Q. And it didn't require training either;
16 correct?

17 A. That's correct.

18 Q. So, if we're looking for a common
19 denominator, there's only one common denominator
20 between the Missouri PTP law and the HQL, and that's
21 the requirement of a permit in order to purchase; am
22 I correct?

1 A. Yes.

2 Q. Do any of the components of the Firearms
3 Safety Act, other than the HQL, not have any effect
4 on firearms violence?

5 A. I have to go through all of these
6 provisions.

7 Q. Just the ones you talked about. Would
8 they not have any effect at all or do you think
9 they'd have some effect on preventing firearms?

10 A. I think some effects. Some of them would
11 be more gradual than others. So, for example, like
12 an enhanced regulatory capacity for State Police
13 with respect to licensed gun dealers, it may be that
14 is a more gradual effect as compliance increases and
15 the degree to which the State Police demonstrate
16 that there are consequences to not following the
17 laws.

18 So that is sort of a question mark of how
19 quickly that might impact laws. The data we have
20 about licensing suggests that, when you have a new
21 law, there's generally some impact that grows a
22 little bit over time, but that's my own opinion is